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★ JUN 26 2018 ★

LONG ISLAND OFFICE

ALB:CNR
F. #2018R001208

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 2251(a))

ROBERT GALLIMORE,

Defendant.

MJ 18-0584

----- X

EASTERN DISTRICT OF NEW YORK, SS:

GUILLERMO E. TURKE, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about and between May 26, 2018 and June 3, 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROBERT GALLIMORE did knowingly and intentionally employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce and which visual depictions were transported and transmitted using a means and facility of interstate and foreign commerce.

(Title 18, United States Code, Section 2251(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. On or about June 3, 2018, a parent ("PARENT1") filed a report with the Suffolk County Police Department, located in Bayshore, New York, stating that her sixteen year old daughter ("VIC") had been contacted by a Kik² user who had a topless photo of VIC and demanded nude photos and videos or they would post the topless photo online and show it to people at her school. This individual also tried to coerce VIC to have sex with him. The individual had knowledge of VIC's address and the name of her high school.

3. An interview with VIC on or about June 3, 2018 and a subsequent interview on or about June 8, 2018, confirmed that VIC had been contacted via Kik by user bdudhd88. VIC further stated that bdudhd88 threatened to post a topless photo of VIC for all

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

² Kik Interactive Inc. is a Canadian company that offers a free instant messaging mobile application (app), Kik Messenger. The app is commonly just called Kik. Kik markets itself as "the only chat platform built especially for teens and as a clear leader in chatbots, Kik will become the central hub for everyday life for teens across the world as we grow." Through the app, users can transmit and receive messages, photos, videos, sketches, mobile webpages, and other content, both publicly (to all users or groups of users) and privately (to a specific user).

of VIC's friends, social media followers and schoolmates to see if VIC did not send pictures and videos of her exposing and touching her genitals. In response, VIC sent approximately eight videos showing VIC exposing and touching her genitals to bdudhd88. The individual also sent VIC two photos of an erect penis.

4. On or about June 5, 2018, FBI agents and a Task Force Officer forensically examined the cellphone of VIC. That examination revealed the following communications between VIC, using her Kik account, and bdudhd88 from May 26, 2018 through June 3, 2018. Some of these communications are summarized below:

bdudhd88: Are you there cause if you don't answer in 19 seconds I'm posting it
 bdudhd88: 10
 bdudhd88: 9
 bdudhd88: 8
 bdudhd88: 7
 bdudhd88: 6
 bdudhd88: 5
 bdudhd88: 4
 bdudhd88: 3
 bdudhd88: 2
 bdudhd88: 1
 bdudhd88: Well
 bdudhd88: Where Is ur video
 bdudhd88: ..
 VIC: It's still sending
 bdudhd88: U lying
 VIC: Did you want me to answer the FaceTime call
 bdudhd88: Sure
 VIC: Will I you face
 bdudhd88: Maybe
 VIC: It's a yes or no answer
 bdudhd88: Ok hanging up now if u ain't answering
 bdudhd88: show pussy and boobs and I'll show face

At a later time:

bdudhd88: U never sent the video
bdudhd88: ... guess I gotta post it now
VIC: No

Later in the conversation, bdudhd88 tells VIC “Actully yohr the 3rd girl im doing this to.” Bdudhd88 then directs VIC on what she should specifically do in the video she sends by saying “So tape ur pussy wide open and open it with ur fingers so i can see deep inside,” “Then in next one show ur self fingering ur self,” “Open pussy n shove fingers deep n fast thn lick fingers” and “Ok shove somthing in there banana cucumber marker hairbrush etc”.

5. Information obtained from Kik indicates that the IP address 73.91.46.209 was used to create and repeatedly access the account username bdudhd88 between May 25, 2018 and June 4, 2018. Records obtained during the course of the investigation from Internet Service Provider Comcast Cable Communications, Inc. (“Comcast”) indicated that the IP address 73.91.46.209 was assigned to the account of the defendant ROBERT GALLIMORE at the 1409 Inspiration Drive, Sebring, Florida 33870 (the “Subject Premises”) from December 14, 2017 16:01:11 UTC and was still active as of June 12, 2018.

6. On June 25, 2018, the Honorable Shaniek M. Maynard, United States Magistrate Judge for the Southern District of Florida, issued a search warrant for the Subject Premises.

7. On June 26, 2018, the FBI executed the search warrant of the Subject Premises. At or near the time of the search of the Subject Premises, the defendant ROBERT GALLIMORE was present at the Subject Premises. GALLIMORE was advised of his rights by the FBI and agreed to waive those rights and speak to the FBI. GALLIMORE then admitted in a written signed statement, in sum and substance, to contacting VIC, whom he

believed to be under the age of 18, via Kik, using the “bdudhd88” account and threatening to send pornographic photographs of VIC to VIC’s school unless she complied with his demands for additional pornographic photographs and videos.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant ROBERT GALLIMORE so that he may be dealt with according to law.



GUILLERMO E. TURKE
Special Agent, Federal Bureau of Investigation

Sworn to before me this
26th day of June, 2018



/s/: A. Kathleen Tomlinson

THE HONORABLE A. KATHLEEN TOMLINSON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK